

**PUGET SOUND AIR POLLUTION CONTROL AGENCY**

110 Union Street, Suite 500, Seattle, Washington 98101-2038

Fax: 206-343-7522

Registration No. 11339

Case No. \_\_\_\_\_

**COMPLIANCE STATUS REPORT**

Date of Report March 5, 19 99 at \_\_\_\_\_ m.

Source Name <u>Ash Grove Cement Co.</u>	Responsible Person, Title <u>Gerald Brown EH&amp;S mgr.</u>
Location <u>3801 E. Marginal Way So. Seattle, WA. 98134</u>	

☐ No violations of PSAPCA's regulations were observed at the time of my inspection, with respect to the areas of the facility I inspected.

☐ During my inspection I noted the following deficiencies:

- Reg. I 9.20 Visible emissions documented from  
① 6-cabler Bag House Exhaust Stack.  
Reg. I 9.20 and  
Reg. I 9.15 (c) Visible Fugitive dust emissions  
documented from the ② Raw Mill exit damper and  
the ③ Hot air blower in the Coal mill

Please explain the cause of the visible emissions,  
the corrective action taken, and the preventative  
measures implemented to prevent a recurrence  
for each of the three incidents described  
above.

Please submit a written report within ten (10) working days describing the necessary corrective action you have taken or propose to take, including a schedule, to address the above deficiencies.

Issued by: \_\_\_\_\_

Received by: \_\_\_\_\_

Signing this is not an admission of guilt

# ASH GROVE CEMENT COMPANY



"WESTERN REGION"

April 26, 1999

Elizabeth Gilpin  
Puget Sound Air Pollution Control Agency  
110 Union Street, Suite 500  
Seattle WA 98101-2038

Dear Ms. Gilpin:

**Re: Compliance Status Report Dated 03/05/99**

The following is further information as you requested on items noted on your March 5 visit.

**G-Cooler Dust Collector:**

On March 5, dust was noted coming from the stack for the G-Cooler dust collector. The collector was shut down immediately to cool for inspection. On March 7, the collector was inspected and repaired by the dust collector specialists. A few bad bags were found and these were replaced. The baghouse received a full bag changeout during our March kiln outage.

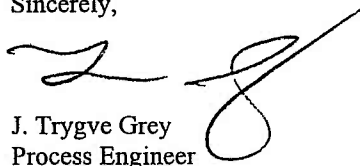
**Raw Mill Exit Damper:**

On March 5, fugitive dust was noted coming from the Raw Mill exit damper. The static pressure in the duct is controlled by the fan for the kiln baghouse. This was increased from -0.5 inches water gauge to -1.0 inches. This was to allow for more fluctuation in the raw mill system.

**Coal Mill Hot Air Blower:**

On March 5, fugitive dust was noted coming from the stack for the hot air blower for coal mill #2. The blower was shut down immediately. During our March kiln outage this was inspected and it was found that the ductwork was plugged. This was cleaned and the blower was put back on line without further incident.

Sincerely,



J. Trygve Grey  
Process Engineer

Registration No. 11339

Case No. \_\_\_\_\_

**COMPLIANCE STATUS REPORT**Date of Report March 23, 19 99 at \_\_\_\_\_ m.

Source Name <u>Ash Grove Cement Co.</u>	Responsible Person, Title <u>Henrik Voldback Manager</u>
Location <u>3801 E. Marginal Way So. Seattle, WA. 98134</u>	

☐ No violations of PSAPCA's regulations were observed at the time of my inspection, with respect to the areas of the facility I inspected.

☒ During my inspection I noted the following deficiencies: review of your 12/98 CEM report the following violations were reported.

Req. I 90  
Not 7381 5(6) > 700 ppm NOx 1 hour Average  
on 12/22/98, 12/24/98, 12/25/98, 12/26/98, 12/29/98  
and 12/30/98.

RECEIVED

APR 02 1999

AGUW-SEATTLE

Please submit a written report within ten (10) working days describing the necessary corrective action you have taken or propose to take, including a schedule, to address the above deficiencies.

Issued by: Elizabeth Lipp

Received by \_\_\_\_\_

3-31-99

Signing this is not an admission of guilt

# ASH GROVE CEMENT COMPANY



"WESTERN REGION" April 26, 1999

Elizabeth Gilpin  
Puget Sound Air Pollution Control Agency  
110 Union Street, Suite 500  
Seattle WA 98101-2038

Dear Ms. Gilpin:

**Re: Compliance Status Report Dated 03/23/99**

The following is further information as you requested on NOX emissions noted on our December CEM Report.

**March 23, 1999:**

The events dated from December 22 through December 30 were caused by interruptions to our tire burning system. The system had experienced many "jams" of tires in the chutes and overloading of the belts. The result is a loss of fuel, increased oxygen to the system and the necessity to change fuels for the calciner quickly. All these cause the kiln to become unstable. At the time, the operator and those in the field work to restore the fuel supply and stabilize the kiln. The system includes a variable speed elevator which loads the tires one by one. The elevator at times was feeding the belt too quickly causing tires to overload the belt. Tuning was done to the controller for the elevator speed to eliminate this problem. The tires are pushed by a hydraulically operated ram into a double gate (airlock) which drops them into the kiln. If the hydraulics were acting slowly for these items, the ram would try to push a tire into the airlock before the top gate opened. Mechanical work was done to these gates during our April kiln outage to make the "ram" for pushing the tires into the airlock and the top gate of the airlock operate together. These events should be excused under WAC 173-400-107(6). The operator took quick action to reduce the NOX and we have worked and are continuing to work on the system.

Sincerely,

J. Trygve Grey  
Process Engineer

Registration No. 11339

Case No. \_\_\_\_\_]

**COMPLIANCE STATUS REPORT**Date of Report April 14, 19 99 at \_\_\_\_\_ .m.

Source Name <u>Ash Grove Cement Co.</u>	Responsible Person, Title <u>Gerald Brown EH &amp; S</u>
Location <u>3801 E. Marginal Way So. Seattle, WA. 98134</u>	

☐ No violations of PSAPCA's regulations were observed at the time of my inspection, with respect to the areas of the facility I inspected.

☒ During my inspection I noted the following deficiencies:

The following violations were reported on your February 1999 CEM report:

Date	Pollutant	Regulation/Permit Condition
2/7/99	CO	NC 7381 #5a > 1045 ppm 8 hr.
2/7/99	CO	NC 7381 #5a > 1045 ppm 8 hr.
2/2/99	NOx	NC 7381 #5b > 700ppm 1 hr.
2/15/99	NOx	NC 7381 #5b > 700ppm 1 hr.
2/28/99	NOx	NC 7381 #5b > 501 ppm 24 hr.
2/11/99	Opacity	

These are not High Priority violations. These violations will be processed as such under the 9/10/98 interim policy for CEMs civil penalty policy which has not been

Board approved and is subject to change.  
~~No response necessary. Explanation was provided in CEM report~~  
 Please submit a written report within ten (10) working days describing the necessary corrective action you have taken or propose to take, including a schedule, to address the above deficiencies.

Issued by: 

Received by \_\_\_\_\_

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**PUGET SOUND AIR POLLUTION CONTROL AGENCY**

110 Union Street, Suite 500, Seattle, Washington 98101-2038

Fax: 206-343-7522

**RECEIVED**

**JUN 14 1999**

Registration No. 11339

Case No. AGUW-SEATTLE

**COMPLIANCE STATUS REPORT**

Date of Report 6/7, 19 99 at \_\_\_\_\_ m.

Source Name <u>Ash Grove Cement Co.</u>	Responsible Person, Title <u>Henrik Voldback Mgr.</u>
Location <u>3801 E. Marginal Way So. Seattle WA. 98134</u>	

☐ No violations of PSAPCA's regulations were observed at the time of my inspection, with respect to the areas of the facility I inspected.

☐ During my inspection I noted the following deficiencies:

The following violations were reported on your  
April 1999 CEM report

<u>DATE</u>	<u>Pollutant</u>	<u>Permit Condition</u>	<u>Actual</u>	
<u>4/27</u>	<u>NOX</u>	<u>NC 7381 #5(b)</u>	<u>1 hr 700ppm/24 hr 501ppm</u>	<u>795ppm/553ppm</u>
<u>4/28</u>	<u>NOX</u>	<u>NC 7381 #5(b)</u>	<u>1 hr 700ppm/24 hr 501ppm</u>	<u>875ppm/523ppm</u>

These determinations were based on the 9/10/1998  
EPA interim CEM civil penalty policy which  
has not been board approved and which is  
subject to change.

Please submit a written report within ten (10) working days describing the necessary corrective action you have taken or propose to take, including a schedule, to address the above deficiencies.

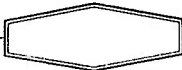
Issued by: [Signature]

Received by: \_\_\_\_\_

Signing this is not an admission of guilt



# ASH GROVE CEMENT COMPANY



"WESTERN REGION"

June 14, 1999

Elizabeth Gilpin  
Puget Sound Air Pollution Control Agency  
110 Union Street, Suite 500  
Seattle WA 98101-2038

Dear Ms. Gilpin:

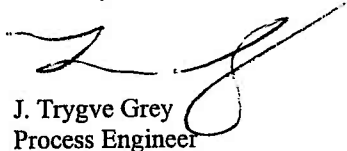
**Re: Compliance Status Report Dated 06/07/99**

The following is further information as you requested Violations of our NO<sub>x</sub> limit on 4/27/99 and 4/28/99.

As reported in our April CEM, the kiln was restarted on April 25<sup>th</sup> after a long outage replacing brick. As often happens after long outages, the kiln feed we have in storage tends to segregate itself. This segregation can create long periods of time (several hours to several days) with kiln feed which is either harder than normal to burn or easier. We restarted the kiln and experienced a long period (two to three days) of high C<sub>3</sub>S (hard to burn) feed. The operator during this period took normal measures to control the NO<sub>x</sub>. These include operating a low oxygen levels in the kiln, keeping the feed as high as possible and some amount of sacrifice to the quality. While it is possible to burn the kiln slightly cooler and sacrifice quality, there reaches a point where this can cause the kiln to become unstable and cause the kiln to cycle and create more NO<sub>x</sub> emissions.

Maintaining consistent chemistry of the kiln feed has always been and still remains a priority. Having consistent feed chemistry aids in the operating stability of the kiln and helps both maintain consistent product quality and lower the NO<sub>x</sub> emissions during kiln operation. During the maintenance shutdown in the last half of March, much work was done to promote this. New airslide fabric was installed in our kiln feed blending silos. The valve between the blending and feed storage silos was redesigned to lessen the segregation of feed in the transfer of material between the two silos. Also in mid-May, the timing of the aeration was modified in the storage silos. This latest change cut the daily standard deviation of our kiln feed statistics by approximately 50%. While we still expect to see swings in our feed chemistry, we hope that the changes made in April and May have dramatically reduced the quantity and magnitude of these events.

Sincerely,



J. Trygve Grey  
Process Engineer

**PUGET SOUND AIR POLLUTION CONTROL AGENCY**

110 Union Street, Suite 500, Seattle, Washington 98101-2038

Fax: 206-343-7522

Registration No. 11339

Case No. \_\_\_\_\_

**COMPLIANCE STATUS REPORT**

Date of Report 6/30, 19 99 at \_\_\_\_\_ m.

Source Name <u>Ash Grove Cement Co.</u>	Responsible Person, Title <u>Hennik Voldbaek, Plt Mgr</u>
Location <u>3801 E Marginal WY S</u> <u>Seattle, WA 98134</u>	

☐ No violations of PSAPCA's regulations were observed at the time of my inspection, with respect to the areas of the facility I inspected.

☒ During my inspection I noted the following deficiencies: of June + July 1999 CEM Reports violations reported:

Date	Deficient	Standard
<u>6/9</u>	<u>NOX</u>	<u>N/C 7381 #5(b)</u>
<u>6/11</u>	<u>NOX</u>	<u>↓</u>
<u>7/10</u>	<u>NOX</u>	<u>↓</u>
<u>7/16</u>	<u>Opacity</u>	<u>I.9.04(c)(1)</u>

These violations will not be subject to penalty per the Agency's 9/10/98 interim CEM civil penalty policy which is not Board approved & subject to change.

No response necessary as explanation provided in CEM report.

~~Please submit a written report within ten (10) working days describing the necessary corrective action you have taken or propose to take, including a schedule, to address the above deficiencies.~~

1.2.99 Issued by: MMCF

Received by \_\_\_\_\_

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**Fax: 206-343-7522**

Case No. \_\_\_\_\_]

Date of Report 8-30, 19 99 at           .m.

☒ No violations of PSAPCA's regulations were observed at the time of my inspection, with respect to the areas of the facility I inspected. - May 1999 CEM Report

[illegible]

**Issued by:**

Received by \_\_\_\_\_

**Signing this is not an admission of guilt**

Registration No. 11339

Case No. \_\_\_\_\_

**COMPLIANCE STATUS REPORT**Date of Report October 29, 19 99 at \_\_\_\_\_ .m.

Source Name <u>Ash Grove Cement Co.</u>	Responsible Person, Title <u>Henrik Voldbaek, Plant Mgr</u>
Location <u>3801 E. Marginal Way So. Seattle, WA. 98134</u>	

☐ No violations of PSAPCA's regulations were observed at the time of my inspection, with respect to the areas of the facility I inspected.☒ During my inspection I noted the following deficiencies: of the August 1999 CEM Report  
Violations reported

Date	Pollutant	Standard
<u>8/19/99</u>	<u>NOX</u>	<u>NOC 7381 #5(b) 501 ppm NOX 24 hr.</u>

This violation will not be subject to penalty  
per the Agency's 9/10/98 interim CEM Civil  
Penalty policy which is not board approved  
and is subject to change.

No response necessary as explanation provided  
in CEM report

Please submit a written report within ten (10) working days describing the necessary corrective action you have taken or propose to take, including a schedule, to address the above deficiencies.

Issued by: [Signature]

Received by: \_\_\_\_\_

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110 Union Street, Suite 500, Seattle, Washington 98101-2038

Fax: 206-343-7522

Registration No. 11339

Case No. \_\_\_\_\_

**COMPLIANCE STATUS REPORT**

Date of Report November 17, 19 99 at \_\_\_\_\_ .m.

Source Name <u>Ash Grove Cement Co.</u>	Responsible Person, Title <u>Henrik Voldback, Plant Manager</u>
Location <u>3801 E Marginal Way S</u> <u>Seattle, WA 98134</u>	

☐ No violations of PSAPCA's regulations were observed at the time of my inspection, with respect to the areas of the facility I inspected.

☒ During my inspection, <sup>if 9/99 CEM report</sup> I noted the following deficiencies:

Violation of NOx standard per N/C 7381#56  
on 9/6/99 in excess of 700 ppm for 1 hour  
average.

This violation will not be subject to penalty  
per 9/10/98 interim CEM policy which is  
not Board approved + subject to change.

No response necessary as explanation  
provided in CEM report.

~~Please submit a written report within ten (10) working days describing the necessary corrective action you have taken or propose to take, including a schedule, to address the above deficiencies.~~

Issued by: [Signature]

Received by: \_\_\_\_\_

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110 Union Street, Suite 500, Seattle, Washington 98101-2038

Fax: 206-343-7522

Registration No. 11339

Case No. \_\_\_\_\_]

**COMPLIANCE STATUS REPORT**

Date of Report December 15, 19 99 at \_\_\_\_\_ .m.

Source Name <u>Ash Grove Cement Co.</u>	Responsible Person, Title <u>Henrik Voldbaek, Plt Mgr</u>
Location <u>3801 E. Marginal Way So.</u> <u>Seattle, WA. 98134</u>	

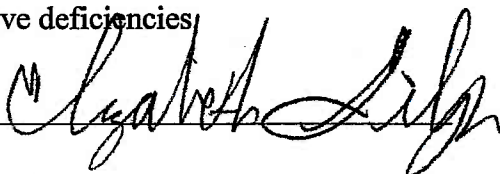
☐ No violations of PSAPCA's regulations were observed at the time of my inspection, with respect to the areas of the facility I inspected.

☒ Review of your October CEM report for 1999,  
During my inspection I noted the following deficiencies:

I observed No Violations reported.

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Please submit a written report within ten (10) working days describing the necessary corrective action you have taken or propose to take, including a schedule, to address the above deficiencies.

Inspected by:   
12.16.99

Received by \_\_\_\_\_  
Signing this is not an admission of guilt